



# 2022 Stormwater Management Program Plan (SWMP Plan)



City of Tukwila  
Public Works Department

## Table of Contents

INTRODUCTION .....	4
STORMWATER MANAGEMENT PROGRAM COMPONENTS.....	6
Stormwater Planning (S5.C.1) .....	7
Public Education and Outreach (S5.C.2).....	9
Public Involvement and Participation (S5.C.3).....	12
MS4 Mapping and Documentation (S5.C.4) .....	13
Illicit Discharge Detection and Elimination (S5.C.5).....	15
Controlling Runoff from New Development, Redevelopment, and Construction Sites 5.C.6) .	16
Operations and Maintenance (S5.C.7) .....	18
Source Control Program for Existing Development (S5.C.8).....	20
COMPLIANCE WITH TOTAL MAXIMUM DAILY LOADS (Special Condition S7) .....	21
MONITORING AND ASSESSMENT (Special Condition S8) .....	22
REPORTING REQUIREMENTS .....	22
CONCLUSION.....	23

## **Acronyms**

AKART	All known, available and reasonable methods of prevention, control, and treatment
BMP	Best Management Practice
EPA	U.S. Environmental Protection Agency
KML	Keyhole Markup Language
LID	Low Impact Development
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
Phase II Permit	Western Washington Phase II Municipal Stormwater Permit
SAM	Stormwater Action Monitoring
SWMP	Stormwater Management Program
TMDL	Total Maximum Daily Load

# INTRODUCTION



The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to restore and maintain the integrity of the nation's waters. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies. In Washington, the NPDES delegated permit authority is the Washington State Department of Ecology (Ecology). The first term of the modern Western Washington Phase II Municipal Stormwater Permit (Phase II Permit) began in January of 2007. The current permit term is five years, from August 1, 2019, through July 31, 2024.

The City of Tukwila prepared this document to meet the requirement for a Stormwater Management Program Plan (SWMP) as required by the NPDES Phase II Permit issued to the City of Tukwila by Ecology. The SWMP was developed to reduce pollutant discharges from the City's Municipal Separate Storm Sewer System (MS4) and inform the public about the planned SWMP activities for the upcoming calendar year.

Tukwila is defined as a Phase II community and, therefore, mandated to comply with the requirements of the NPDES Phase II Permit. Phase II communities are those that:

- Are not already covered in a regional Phase I program
- Own and operate a storm drain system
- Discharge to surface waters of the state
- Are in urbanized areas (UAs)
- Have a population of more than 1,000

Approximately 100 other municipalities in Washington must now comply with the Phase II Permit operators of small MS4s. Ecology's Phase II Permit is available on Ecology's website at: <http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phaseIIwww/wwphiipermmit.html>



The Permit allows discharge of stormwater runoff from municipal drainage systems into the state's water bodies (i.e., streams, rivers, lakes, wetlands, etc.) if municipalities implement programs to protect water quality by reducing the discharge of pollutants to the "maximum extent practicable" (MEP). In addition, the City must meet "all known and reasonable treatment" (AKART) through application of Permit specified "best management practices" (BMPs).

The Permit also requires the City, by March 31 of each year, to provide an Annual Report for each previous year's activities that documents the City's compliance with the Permit. Both the Annual Report and the updated SWMP are to be posted on the City's website no later than May 31 of each year.

# STORMWATER MANAGEMENT PROGRAM COMPONENTS



The BMPs specified in the Permit are collectively referred to as the SWMP and grouped under the following program components:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Operations and Maintenance
- Source Control Program for Existing Development

In addition to the SWMP components, the Permit contains special conditions covering:

- Total Maximum Daily Load Requirements
- Monitoring and Assessment
- Reporting Requirements

The following sections describe requirements of each program component and the City's planned activities to meet the requirements. In general, the City of Tukwila is currently performing all previously required Permit activities and has plans in place to address the updated and new Permit requirements.



## 1 STORMWATER PLANNING (S5.C.1)

### OVERVIEW

Stormwater Planning is a new permit component that requires Permittees to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

### 1.1 PERMIT REQUIREMENTS

The Phase II Permit (Section S5.C.1) requires the City to fulfill the following minimum performance measures:

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of the Stormwater Planning Program by August 1, 2020.
- Coordinate with long-range plan updates by January 1, 2023, that describes how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in their jurisdiction. The report shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect an improve local receiving water health through planning or taking into account stormwater management needs or limitations.
- Continue to require low impact development (LID) principles and Best Management Practices (BMPs) when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed. The intent shall be to make LID the preferred and commonly used approach to site development.
- Stormwater Management Action Plan (SMAP): The City shall conduct a similar process and consider the range of issues outlined in the *Stormwater Management Action Planning Guidance* (Ecology, 2019; Publication 19-10-010).

**Receiving Water Assessment.** Permittees shall conduct and assess existing information related to their local receiving waters and contributing area conditions to identify which receiving waters are most likely to benefit from stormwater management planning.

By March 31, 2022, Permittees shall submit a watershed inventory and include a brief description of the relative conditions of the receiving waters and the contributing areas. The watershed inventory shall be submitted as a table with each receiving water name, its total watershed area, the percent of the total watershed area that is in the Permittee's

jurisdiction, and the findings of the stormwater management influence assessment for each basin. Indicate which receiving waters will be included in the S5.C.1.d.ii prioritization process. Include a map of the delineated basins with references to the watershed inventory table.

*Receiving Water Prioritization.* Informed by the assessment of receiving water conditions, and other local and regional information, the City shall develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SMAP actions, and other land/development management actions (different than the existing new and redevelopment requirements). The retrofits and actions shall be designed to: 1) conserve, protect, or restore receiving waters through stormwater and land management strategies that act as water quality management tools, 2) reduce pollutant loading, and 3) address hydrologic impacts from existing development as well as planned for and expected future buildout conditions. No later than June 2022, document the prioritized and ranked list of receiving waters.

## **1.2 CURRENT ACTIVITIES**

- The City convened an inter-disciplinary standing committee from Public Works and Community Development to inform and assist in the development, progress, and influence of the Stormwater Planning Program.
- Coordination with long-range plan updates include the hiring of a consultant to help develop an inventory of stormwater basins within its jurisdiction and areas that are partially within the City limits, including conducting a receiving waters assessment. In addition, with assistance from the consultant, the City began addressing receiving water prioritization. The City has also begun the process of updating its current Comprehensive Surface Water Management Plan that will be useful in the long-range planning efforts.
- The City's qualified staff, addresses LID and BMPs weekly during development review meetings. In addition, annually assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since codes were last updated in 2016.
- The City hired a consultant to help develop a SMAP and is on track to meet permit requirements. The City has to date listed all receiving waters in the City, described methods of analysis and has a preliminary analysis of each basin, compiled data for an overall assessment and updated the basin delineation map.



## Planned Activities 2022

- The City will continue efforts to inform and assist in the development, progress, and influence of the Stormwater Planning Program.
- The City will continue with updating its Surface Water Comprehensive Plan, which will be useful in the coordination efforts with long-range planning.
- City Municipal Code Title 14 will be updated this year with the adoption of the 2021 King County Surface Water Design Manual and the 2021 King County Stormwater Pollution Prevention Manual. The City Infrastructure, Design and Construction Standards is updated and is used to address LID.
- The City continues to create a detailed analysis of each basin, prioritization of the basins, and selection of high priority watershed which is due June 30, 2022. This work will help with the preparation to submit a SMAP for at least one high priority catchment area.

## Public Education and Outreach (S5.C.2)

### Overview

The city's public education and outreach program actively seeks to build stormwater pollution awareness and promote behavioral change with an ultimate goal of reducing pollutants in stormwater and improving water quality of the city's MS4 and water bodies of the state.

### 2.1 Permit Requirements

The Phase II Permit (Section S5.C.2) requires the City to fulfill the following minimum performance measures:

- Build general awareness and annually select at minimum one target audience and one subject area as listed in the Phase II Permit.
- Affect behavior change by selecting at a minimum, one target audience and one BMP as listed in the Phase II Permit.
- Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.
- Track and maintain records of public education and outreach activities and summarize these activities in the Annual Report.



**Commented [MP1]:** Match text size and font from above for this section

## 2.1 Current Activities

### General Awareness

The pandemic has been problematic, however the City will continue to refine and implement general awareness, with the general public and businesses, with activities and programs. Identify/interact with target audiences with different subject areas using existing resources:

### Permit Section S5.C.2

- City's NPDES webpage, <https://www.tukwilawa.gov/departments/public-works/npdes/>
- Current Stormwater Management Program Plan
- Stormwater brochures
- Public notices
- Instructional posters
- Instructional video series
- K-12 education program TBD
- Suds Free Car Wash Kit
- Tukwila's government Channel 21
- Notice boards
- Puget Sound Spill Kit Program
- Puget Sound Starts Here campaign
- City's IDDE Program
- Backyard Wildlife Event TBD
- Touch a Truck Event TBD
- City Twitter account

To effect behavior change, the City targets the following audience:

- Businesses (including home-based or mobile businesses).

To effect behavior change, the City promotes the following BMPs:

- Fueling and fuel transfer
- Outdoor manufacturing
- Outdoor equipment/vehicle maintenance
- Vehicle equipment, or building washing
- Landscape construction/maintenance
- Outside storage of uncovered materials
- Storage of solid and food waste, including cooking grease
- Sweeping instead of spraying to clean paved areas
- Catch basin inserts
- Secondary containment
- Covering of materials stored outside
- Pressure washing of buildings, rooftops, and other large items

## **Planned Activities 2022**

The City will build general awareness with businesses (including home-based, or mobile businesses) in the following subject area:

- General impacts of stormwater on surface waters, including impacts from impervious surfaces.

To accomplish this the City plans on the following:

- Partner with ECOSSE to conduct the regional Puget Sound Spill Kit Program
- Partner with Puget Sound Starts Here campaign
- The City will begin to use social marketing practices per option S5.C.2.a.ii(c)3
- Concentrate on dumpster BMPs and partner with the regional campaign.

## **Behavioral Change Effectiveness**

To determine the effectiveness of the City's Public Education and Outreach, the City hired a consultant to conduct an online survey with an outcome of Community Stormwater research findings. The objectives were to research and measure citizens general knowledge of the following:

- Perception of stormwater quality
- Stormwater runoff
- Major causes of stormwater pollution
- Vehicle maintenance, including automotive fluid leaks and washing
- Pesticides, herbicides, fertilizers, and chemical treatments
- Erosion and sediment pollution
- Illicit discharges
- Pervious pavements
- Rain gardens
- Infiltration
- Cost of protecting our neighborhood streams, rivers, and Puget Sound

It is the intent of the City to continue with this effort but will need to consider virtual, in person, and the pandemic disruption.

## **Stewardship Opportunities**

Continue stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities. Current activities:

- Storm drainage marker program for public and private properties.
- Partner with Forterra, EarthCorps, Boeing Employee Credit Union, Student Conservation Association, Dirt Corps, EarthCorps, King Conservation District, Duwamish Alive Coalition, King County Parks, Partner in Employment, resident-based community groups, and volunteers to provide stewardship and restoration activities in Tukwila's parks and shoreline areas.
- Green Tukwila 20-year Stewardship Plan to provide a strategy for active restoration and management of public land.

## Planned Activities 2022

- Partner with Waste Management to conduct 2022 Residential Recycling Collection Event and Rain Barrel Sale. TBD
- Promote creek maintenance and prepare for an education and outreach campaign that will emphasize the “Streamside Planting Guide for Western Washington”.
- Promote stewardship opportunities at sponsored public events. This action will need to be evaluated prior to the event.

## Public Involvement and Participation (S5.C.3)



### Overview

The City welcomes public input to its Stormwater Management Program Plan and a new component of the Phase II Permit, Stormwater Management Action Plan (SMAP) requirement.

### 3.1 Permit Requirements

The Phase II Permit (Section S5.C.3) requires the City to fulfill the following minimum performance measures:

- Provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participating in developing rate-structures, SWMP Plan development and implementation or other similar activities.
- Make available and post the current SWMP Plan and Annual Report for the previous years on the City’s website no later than May 31st of each year. Make available to the public all other documents to be submitted to Ecology as required by the Permit.

### Current Activities

- The public is invited to all City Council, Committee of the Whole, and Transportation and Infrastructure Committee meetings including City workshops where input on NPDES Phase II Permit related topics is accepted. Currently, meetings are conducted virtually with access given to the general public.
- Provide notices of upcoming workshops to solicit public input, on the City’s NPDES website, and City calendar. In addition, when appropriate, notices will be posted at strategic locations such as City Hall, Public Works, Community Development and at the Tukwila Community Center.



- The City maintains the most current SWMP Plan and Annual Report on its NPDES website. All other submittals are available to the public upon request.

## Planned Activities

- Upload the 2021 Annual Report and the 2022 SWMP Plan to the City's NPDES website.
- Upload the 2022 SMAP to the City's website.
- Provide opportunities for public input to the SMAP process.
- Provide opportunities for public input to updating the Surface Water Comprehensive Plan.

## MS4 Mapping and Documentation (S5.C.4)



## Overview

The City's mapping continues to evolve and is used by development activities, capital improvement projects, tracing illicit discharges and, maintenance and operations.

## Permit Requirements

The Phase II Permit (Section S5.C.4) requires the City to fulfill the following minimum performance measures:

- Ongoing mapping of known MS4 outfalls and discharge points, receiving waters, stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee, geographic areas served by the MS4 that don't discharge to surface waters, tributary conveyances to outfalls that are 24 inches in diameter or larger, connections between MS4s, and connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- No later than January 1, 2020, begin collecting size and material for all known MS4 outfalls, and update records.
- Complete mapping of all known connections from the MS4 to privately owned stormwater systems before August 1, 2023.
- Utilize electronic mapping format with fully described mapping standards by August 1, 2021.

- Make maps available to Ecology, federally recognized Indian Tribes, municipalities, and other Permittees upon request.

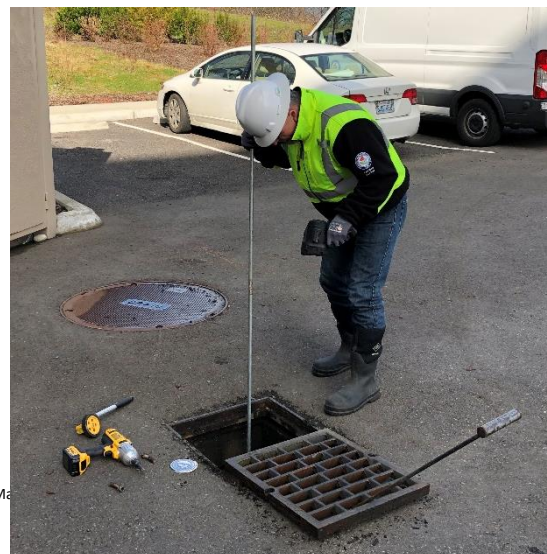
### Current Activities

- The City completed mapping of outfalls, discharge points and related permit requirements and will continue to update our GIS mapping as new drainage systems are constructed and/or discovered.
- The City has identified and mapped size and material of all known MS4 outfalls and will routinely do so if new outfalls are discovered and/or installed. The City Operations and Maintenance Division has a key role in this activity and coordinates newly discovered facilities with the City's GIS Department
- In 2015, the City NPDES Inspector began identifying and mapping privately owned stormwater system. As new development occurs, the City will map storm drains that connect to the City's storm drainage infrastructure.
- The City's GIS electronic stormwater mapping format is well established with ongoing GIS mapping maintenance.
- The City makes GIS mapping of the MS4 in electronic format available to Ecology, Tribes, other jurisdictions, and the public as requested.
- 

### Planned Activities:

- The City will routinely update the electronic drainage mapping of newly discovered MS4 outfalls and City installed stormwater treatment and flow control facilities. This will include our recently mapped receiving waters and mapping standards as needed.
- The City will continue mapping connections of private storm drainage systems to the City's MS4 as new connections are made. This includes mapping previously made connections identified during routine maintenance activities.

## Illicit Discharge Detection and Elimination (S5.C.5)



## Overview

The City's Stormwater Management Program Plan has a process in place with the goal to prevent, detect, characterize, trace and, eliminate illicit discharges and illicit connections to the City's MS4 and ultimately the waterbodies of the state.

### 5.1 Permit Requirements

The Phase II Permit (Section S5.C.5) requires the City to fulfill the following minimum performance measures:

- Implement an ongoing Illicit Discharge Detection and Elimination (IDDE) program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.
- Implement an ordinance to effectively prohibit non-stormwater, illicit discharges and dumping into the City's MS4.
- Implement a field screening methodology that includes an average of 12% of the MS4 each year.
- Implement a program to address illicit discharges into the MS4.
- Provide training to appropriate City employees on proper IDDE response SOPs and train municipal field staff to recognize and report illicit discharges.

### Current Activities

The City has an ongoing IDDE program that includes reporting illicit discharges and spills and takes corrective actions per established procedures. Also, addresses IDDE through typical maintenance and operations of catch basins, water quality, flow control structures, storm drainage cleaning, video detection. In addition, employees are very knowledgeable with inspection of storm drainage facilities under construction, catch basin inspection program for commercial properties and, responding to reported illicit discharges.

- Tukwila's Municipal Code – Title 14.31 is the regulatory mechanism used to prohibit and enforce non-stormwater and illicit discharges to the City's MS4.
- The City typically screens greater than 45% of its MS4 which exceeds the required minimum 12%. Staff utilizes *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual* and responds to illicit discharges and spills as reported to the spill reporting hotline number, 206-433-1870 and Ecology's Environmental Report Tracking. Follow up to these events are conducted as needed. During routine maintenance, discovery of an illicit discharge is immediately responded to.
- The City has an established IDDE program by which staff routinely conducts visual inspections and use of video detection equipment to detect illicit connections and discharges. When discharges are discovered, immediate evaluation is conducted, and appropriate containment is implemented. Investigation of the source of the illicit discharge is conducted, notification and education are then given, and follow up and enforcement initiated when necessary.
- Appropriate training is provided to City employees, in particular field staff. Training of new hires are conducted using previous training materials until their training is up to date.

### Planned Activities

- City staff will continue to implement its IDDE program. In addition, will review its IDDE program to determine if any updating should occur.



- Title 14.31 will be updated this year with the adoption of the 2021 King County Stormwater Pollution Prevention Manual which will be used educate business and residents of required BMPs.
- The city hired new maintenance employees and will hire an additional employee. When the hiring process is completed, training of these new employees will commence.

## Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.6)



### Overview

The City's development review and inspection staff has a process in place to address new development, redevelopment, and construction sites. The main purpose is to reduce pollutants in stormwater runoff to a regulated MS4.

### 6.1 Permit Requirements

The Phase II Permit (Section S5.C.6) requires the City to fulfill the following minimum performance measures:

- Implement and enforce an ordinance that addresses runoff from new development, redevelopment, and construction site activities. Make effective an updated program no later than June 30, 2022.
- Adopt minimum stormwater design standards that are equivalent to the minimum technical requirements in Appendix 1 of the Phase II Permit.
- Implement a permitting process with site plan review, inspection, and enforcement capability, using qualified personnel, for private and public projects.
- Provide a link to the electronic "Notice of Intent (NOI) for Construction Activity" and "NOI for Industrial Activity" to representative of proposed new development and redevelopment.
- Train staff to implement the program.
- Track and maintain records of activities associated with the regulation of new development, redevelopment, and construction sites, and summarize these activities in the Annual Report.

### Current Activities

- The City adopted Tukwila Municipal Code (TMC) Title 14.30 *Surface Water Management*. This code includes the 2016 King County Surface Water Design Manual (2016 KCSWDM). These stormwater design requirements are equivalent to the minimum technical



requirements provided in Appendix 1 of the previous Phase II Permit. In addition, the City adopted TMC Title 16.36 which includes *Infrastructure Design and Construction Standards*. The City has prepared a draft ordinance and is in position to adopt the King County 2021 Surface Water Design Manual.

- As part of the permitting process, pre-application meetings and weekly plan review meetings are conducted to ensure applicants' project plan submittals will meet stormwater regulations and that long-term operation and maintenance of water quality and flow control will meet the 2016 KCSWDM maintenance standards.
- All public and private development construction sites (including transportation projects) are inspected by qualified personnel prior to start, during, and post construction, and enforcement occurs when necessary.
- Inspect, prior to clearing and construction, permitted development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Damage Potential, or, alternatively, inspect all construction sites meeting the minimum thresholds adopted.
- Inspect all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. Enforce as necessary based on the inspection.
- Manage maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential development every 6 months, until 90% of the lots are constructed to identify maintenance needs and enforce compliance with maintenance standards as needed.
- Inspect all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater facilities.
- Document compliance with the inspection requirements in S5.C.6.b.ii through v. Compliance shall be determined by achieving at least 80% of required inspections.
- Keep records of inspection and enforcement actions, including inspection reports, warning letters, notices of violation, and other enforcement records. Keep records of maintenance inspections and activities on eTRAKit.
- Implement an enforcement strategy in cases of non-compliance.
- Provide electronic links to Ecology's "NOI for Construction Activity" and "NOI for Industrial Activity" to the applicants as part of the new development and redevelopment permit process.
- Train all staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites (including permitting, plan review, construction site inspections, and enforcement) to conduct these activities. Keep training records.

## Planned Activities

- The City will adopt by ordinance the *2021 KCSWDM* by June 30, 2022. This manual is the equivalent to the Washington State Department of Ecology *2019 Stormwater Management Manual for Western Washington (2019 SMMWW)*.
- The City will review its permitting process and make any necessary changes to ensure compliance with the Phase II Permit.

## Operations and Maintenance (S5.C.7)



### Overview

The City has implemented an operations and maintenance (O&M) program that is made up of, surface water and sewer, water, and streets divisions. Maintenance activities of city owned stormwater facilities are required to be documented and are primarily addressed by the City Surface Water Department and supported by the sewer, water and street departments when needed. The goal is to prevent or reduce stormwater impacts.

### 7.1 Permit Requirements

The Phase II Permit (Section S5.C.7) requires the City to fulfill the following minimum performance measures:

- Implement maintenance standards that are as protective, or more protective, than those specified in the *Stormwater Management Manual for Western Washington* or a Phase I program.
- Conduct inspection of regulated private stormwater treatment and flow control BMPs/facilities that were permitted under the 2007-2019 Phase II stormwater permit. Enforce maintenance as necessary by the maintenance standards.
- Conduct inspections of all municipally owned stormwater treatment and flow control BMPs/facilities and conduct necessary maintenance that will meet City adopted maintenance standards.
- Spot check City owned flow control and water quality facilities after major storm events and repair if needed or perform any necessary maintenance.

- Inspect all city owned catch basins every two years that were permitted in 2007 and clean if needed to comply with maintenance standards.
- Implement practices, policies and, procedures to reduce stormwater impacts from city owned and maintained lands.
- Implement a training program for staff addressing the importance of protecting water quality. Document and maintain records of the training provided.
- By December 31, 2022, update as necessary City *Stormwater Pollution Prevention Plans (SWPPP)* for all city owned heavy equipment maintenance or storage yards, and material storage facilities.

#### Current Activities

- The City adopted the Phase I standards, specifically, the 2016 KCSWDM to implement the O&M program with the goal of reducing and preventing pollutant runoff from municipal operations. The City has reviewed the 2021 KCSWDM and is preparing to adopt this manual by ordinance by June 30, 2022.
- The City inspection program is well established and currently follows the 2016 *King County Stormwater Pollution Prevention Manual (KCSPPM)* as a maintenance standard guideline for industrial, commercial, and multi-family and residential properties.
- The City conducts annual inspections of City owned stormwater facilities including stormwater treatment and flow control facilities on a circuit basis. As forementioned, the City currently uses the 2016 KCSWDM as guidance to determine if and when maintenance of storm drainage facilities need to be provided.
- Staff maintains a list of potential problem areas that are monitored and maintained prior to, during and after major storm events. Additional inspections occur at the discretion of the surface water department.
- Maintenance personnel provides stormwater inspection of cb's on a circuit basis. When necessary, required maintenance of cb's is listed on a work order and scheduled for a later date. Drainage structures in need of extensive repairs is listed on the City's small drainage repair program and addressed the following year.
- The City has developed a SWPPP for each of its maintenance and storage yards that is reviewed annually. Records of routine inspections of these facilities and their BMPs are documented in Lucity.

#### Planned Activities

- The City will adopt the 2021 KCSWDM and 2021 KCSPPM by June 30, 2022 and use these manuals as a guidance tool for designing, construction and maintenance of its storm drainage facilities.
- Training will be conducted this year for existing and newly hired maintenance personnel.
- The City will relocate the existing Fleet and Building Services Operations, including equipment and storage yards to a new facility and will revise the existing SWPPP which will identify BMPs for this new site.

### Source Control for Existing Development (S5.C.8)

**Commented [MP2]:** HI Greg - can we discuss this one please?

**Commented [GV3]:** Of course

**Commented [GV4]:** FYI, we have a SPPP in place for the George Long facility and when G.L. relocates to the new facility a new SPPP will be needed showing cb's, storm drain lines, spill kit locations, etc.



## Overview

The Source Control Program (SCP) for Existing Development is a new permit requirement to be part of the City's Stormwater Management Program Plan.

### 8.1 Permit Requirements

The Phase II Permit (Section S5.C.8) requires the City to fulfill the following minimum performance measures:

- Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4.
- By August 1, 2022, adopt an ordinance to require application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.
- Establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4 by August 1, 2022.
- Beginning January 1, 2023, inspect pollutant generating sources at publicly and privately owned institutional, commercial, and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4.
- Implement a progressive enforcement policy that requires sites to comply with stormwater requirements beginning January 1, 2023.
- Train staff to conduct these activities.

### Current Activities

- The City hired a consultant to assist in preparing to meet Source Control requirements. A gap analysis was prepared and used as additional guidance to develop the Source Control Program.
- The consultant has drafted a draft source control ordinance for City review that includes enforceable language requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities which will meet the permit requirements.



- The City is proceeding to develop an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutant to the MS4

### **Planned Activities**

- The City will adopt a Source Control Code that will be inserted into TMC. 14.30 Surface Water Management or TMC 14.31 Illicit Discharge Detection and Elimination.
- Identify and create an inventory of businesses with potential pollutant generating activities for both privately owned and city owned storm drainage facilities.
- Prepare to implement a source control inspection program. This includes hiring an employee to conduct inspections.
- Provide necessary training for those responsible for implementing the source control program.

## **COMPLIANCE WITH TOTAL MAXIMUM DAILY LOADS (SPECIAL CONDITION S7)**

### **Overview**

Special Condition S7 applies if a Total Maximum Daily Load (TMDL) is approved for stormwater discharges from MS4s owned or operated by the Permittee. Applicable TMDLs are TMDLs which have been approved by EPA on or before the issuance date of this Permit or prior to the date that Ecology issues coverage under this permit, whichever is later. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still safely meet water quality standards. Ecology determines the reduction of pollutant discharge needed to be compliant with water quality standards.

A TMDL has not been established for the City of Tukwila receiving waters at this time, consequently no action needed at this time.

## **MONITORING AND ASSESSMENT (SPECIAL CONDITION S8)**

### **Overview**

Special Condition S8 requires the City to either conduct Status and Trends Monitoring and Effectiveness and Source Identification Studies or participate by paying annually into a collective fund to implement monitoring under Ecology oversight through the Stormwater Action Monitoring (SAM) program.

### **Current Activities**

- The City committed in 2019 to pay into the collective SAM monitoring fund.
- Annual contribution amounts for next five years:  
S8.A – Regional Status and Trends Monitoring, the City will pay **\$3,252**.

S8.B – Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies, the City will pay **\$5,943**. The **total fee of \$9,195** is due each year by August 15 until the permit expiration date of July 31, 2024.

### **Planned Activities**

- The City will continue to make the forementioned payments to Ecology in support of the SAM program.

## **REPORTING REQUIREMENTS (SPECIAL CONDITION S9)**

### **Overview**

The City continues to meet reporting and submittal requirements.

### **Permit Requirements**

- Submit an Annual Report electronically no later than March 31<sup>st</sup> of each year using Ecology's Water Quality Permitting Portal (WQWebPortal).
- Keep all records related to the Phase II Permit and the SWMP for at least five years.
- Make all records related to the Phase II Permit including the SWMP and the most recent Annual Report available to the public at reasonable times during business hours.
- Each Annual Report shall include the following:
  - A copy of the current SWMP Plan, as required by S5.A.2.
  - Submittal of the Annual Report form as provided by Ecology, describing the status of implementation of the requirements of the Phase II Permit during the reporting period.
  - Attachments to the Annual Report form including summaries, descriptions, reports, and other information as required, or is applicable, to meet the requirements of the Phase II Permit during the reporting period, or as a required submittal.
  - If applicable, notice that the MS4 is relying on another governmental entity to satisfy any of the obligations under the Phase II Permit.
  - Certification and signature, and notification of any changes to authorization.
  - A notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the geographic area of permit coverage during the reporting period

### **Current and Planned Activities**

- Prepare and submit the Annual Report by March 31<sup>st</sup>
- Include a copy of the SWMP Plan
- Attach required summaries, descriptions, reports, and other applicable information.
- Meet certification and signature submittal requirements.

## CONCLUSION

The current Western Washington Phase II Permit expires on July 31, 2024. The Permit was reissued on July 1, 2019 and become effective on August 1, 2019. This SWMP Plan has been prepared to demonstrate efforts and compliance with the requirements of this current NPDES Phase II Permit. This SWMP Plan will be a working document with updates annually until the expiration date.

Additional information on the City's NPDES program can be found online at <https://www.tukwilawa.gov/departments/public-works/npdes/>

The public is encouraged to participate in the development of the SWMP Plan. Please contact Greg Villanueva of the City of Tukwila's Public Works Department with questions, comments, or ideas at:

Mail: Greg Villanueva, NPDES Coordinator  
Department of Public Works  
City of Tukwila  
6300 Southcenter Blvd, Suite 100  
Tukwila, WA 98188-8548  
Phone: 206-431-2442  
Email: [greg.villanueva@tukwilawa.gov](mailto:greg.villanueva@tukwilawa.gov)  
Website: <https://www.tukwilawa.gov/departments/public-works/npdes/>